

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 00-6241-CR-ZLOCH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID APPEGATE and  
RAMIN BAHARMAST,

Defendants.

FILED  
CLERK OF COURT  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
JAN -9 PM 3:10  
2001

JOINT MOTION FOR CONTINUANCE

COMES NOW the Defendants, DAVID APPEGATE and RAMIN BAHARMAST, by and through undersigned counsel, and respectfully move this Honorable Court for an Order continuing the Sentencing in the above-styled cause, and as grounds would state unto this Court the following:

1. The Defendant and Co-defendant are scheduled to be sentenced in the above-styled case on January 12, 2001.
2. The Government and Co-defendant join in on this Motion for Continuance.
3. Special Agent Devine and members of the Drug Enforcement Agency are also requesting additional time.
4. A transaction involving a foreign country is expected to occur in the near future.
5. The Government and both Defendants respectfully request this Honorable Court to continue the above-styled matter two (2) weeks so that the Court could take into consideration all of the Defendants' cooperation.

WHEREFORE, based upon the foregoing, the Defendants respectfully request that this

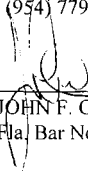
  
46

Honorable Court continue the Sentencing in the above-styled cause.

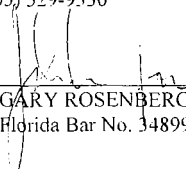
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. mail to Assistant U.S. Attorney Roger W. Powell, 500 E. Broward Blvd., 7<sup>th</sup> Floor, Ft. Lauderdale, FL 33394-3002; and to this 9<sup>th</sup> day of January, 2001.

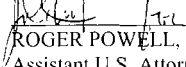
JOHN F. COTRONE, P.A.  
Attorney for the Defendant  
509 S.E. 9<sup>th</sup> Street, Suite 1  
Ft. Lauderdale, FL 33316  
Tel:: (954) 779-7773

By:   
JOHN F. COTRONE  
Fla. Bar No. 0827762

GARY ROSENBERG, ESQ.  
Attorney for Defendant Baharmast  
255 Alhambra Circle, Suite 425  
Coral Gables, FL 33134  
Tel: (305) 529-9330

By:   
GARY ROSENBERG, ESQ.  
Florida Bar No. 348996

ROGER POWELL, ESQ.  
U.S. Attorney's Office  
500 E. Broward Blvd., 7<sup>th</sup> Floor  
Ft. Lauderdale, FL 33394-3002  
Tel: (954) 356-7254

By:   
ROGER POWELL, ESQ.  
Assistant U.S. Attorney